

ITEM 1 – COVER PAGE

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FORM ADV PART 2A

FIRM BROCHURE

MARCH 5, 2024

This brochure provides information about the qualifications and business practices of Cornerstone Wealth Partners, LLC. If you have any questions about the contents of this brochure, please contact us at (517) 381-3450. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Cornerstone Wealth Partners, LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Cornerstone Wealth Partners, LLC is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Cornerstone Wealth Partners, LLC CRD number is 146602.

ITEM 2 - MATERIAL CHANGES

We have the following material changes to report since our firm's last annual update on January 27, 2023:

- Items 4 & 5 – Financial Planning Consultations are now offered as an advisory service for a fee. Please see these Items for additional details.
- Item 9 – Our Disciplinary Information section has been updated to reflect the consent order and penalties from the California Department of Financial Protection and Innovation.

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ITEM 4—ADVISORY BUSINESS

OWNERSHIP/ADVISORY HISTORY

Cornerstone Wealth Partners, LLC (“Cornerstone Wealth Partners”) is a Michigan Limited Liability Company and an investment adviser. Evan Vanderwey and Steve Vanderwey founded Cornerstone Wealth Partners in 2008. In March 2020, Steven Vanderwey sold his ownership interest to Evan Vanderwey who is now our sole owner, Managing Member and Chief Compliance Officer.

At Cornerstone Wealth Partners, our objective is to help you invest your assets with a goal of meeting your investment objectives and financial needs.

ADVISORY SERVICES OFFERED

FINANCIAL CONSULTATIONS

We provide financial consultations on matters involving securities as well as non-securities topics, such as debt reduction and real estate. First, we will meet with you to discuss your current financial situation. We analyze your investment portfolio, prepare a market investment analysis of your investment portfolio, classifying your portfolio into its current asset class allocation, and calculate an historic rate of return. We will conduct a Portfolio MRI™, a diagnostic measure of your investment portfolio. The Portfolio MRI™ includes:

- A cost analysis,
- A discussion of historical returns of basic asset categories or markets,
- A simulation of your portfolio’s historical risk and return characteristics, and
- A comparison of the risk versus reward characteristics of your portfolio against broadly diversified mixes.

The goal of the Portfolio MRI™ is for you to gain an understanding of how diversified your current portfolio is, how efficient your portfolio is in terms of the amount of return you can expect for your given risk level, and the amount of overlap you may have in your current portfolio.

In addition, we can provide specialized investment advice on a more limited basis. This may include advice on only an isolated area(s) of concern or specific topic. You may engage us to help you identify your investment philosophy, understand your investment strategy, and provide discipline throughout your investment experience. If you would like ongoing financial consultations, we coach you in your investment decision-making processes to help you stay on track for achieving the results you want.

In our discussions with you, we will make recommendations for implementing the investment advice we give you. You are under no obligation to act on our recommendations. Moreover, if you elect to act on any of our recommendations, there is no obligation to effect the transaction through any company recommended by us. Our recommendations are based on your financial situation at the time our analysis is presented and based on financial information disclosed by you to us. Certain assumptions are made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is in no way an

indication of future performance. We do not offer any guarantees or promises that your financial goals and objectives will be met.

Please note: When we provide financial planning services and you implement the financial plan through one of our representatives, the representative will receive compensation in the form of a commission or fee. This creates a conflict of interest between the representative and you. Therefore, when providing financial planning services, we would like you to note: (a) a conflict of interest exists between the representatives' interests and your interests, (b) you are under no obligation to act upon the recommend, and (c) if you elect to act on any of the recommendations, you are under no obligation to effect the transaction through the representative. If the financial plan recommends insurance products and you implement the recommendation of such products through our representative, the representative shall receive compensation in the form of a commission or fee. Please see Item 10.D – Other Industry Affiliations for details regarding conflicts of interests associated with the sale of insurance products.

INVESTMENT MANAGEMENT

Depending upon the results of our review or analysis and your individual situation, we will recommend the investment of your capital into one of the following Matson Money, Inc. ("Matson Money") formerly Abundance Technologies asset allocation programs; the "Matson Fund Platform" or the "Frontier Adjusted Portfolio Program". All recommendations depend on your circumstances, goals and objectives, strategy desired, account size, risk tolerance, or other factors. You are not obligated to take advantage of any of our recommendations.

Under the Matson Fund Platform, your assets are invested primarily in the Free Market Funds, but if appropriate, may also be invested in variable insurance products (the underlying investments are the Free Market Funds). Under the Frontier Adjusted Portfolio Program, your assets are allocated to any one or a combination of the series of Free Market Funds. Portfolios are adjusted annually to reduce their risk profile over time. The Free Market Funds and the Matson Money Funds are six series of a no-load mutual fund (registered as "The RBB Fund, Inc.") which are funds of funds under Matson Money's management.

If you choose to go forward with our recommendation to invest in a Matson Money program, you will enter into a written Investment Management Agreement with Matson Money and Cornerstone Wealth Partners. Under this agreement, you authorize Matson Money to supervise and direct your investment accounts on a discretionary basis in accordance with the investment objectives for each account.

In either Matson Money program, Matson Money takes responsibility for investment management, portfolio design, best execution, portfolio reporting, trading, trade error resolution, and custodian reconciliations. Our responsibilities include:

- Providing you with Matson Money', Inc.'s Form ADV Part 2 and Co- Advisor Disclosure Statement,
- Maintaining a relationship with you,
- Ensuring that information about your specific goals, financial situation and risk preference remain current and advising Matson Money of changes in this information,
- Assisting you in determining appropriate allocation models,

- Reviewing account activity periodically,
- Contacting or meeting with you annually, and
- Responding to your inquiries.

COLLEGE SAVINGS

If you have a need for a college savings plan, we will recommend the Education Savings Account offered by Matson Money. If you have other college savings accounts that you would like us to manage which cannot be transferred to Matson Money, we can recommend another Section 529 College Savings Plan.

We usually recommend a Section 529 College Savings Plan offered by The Hartford Group because their plan uses the DFA Funds which are similar to Matson Money's Education Savings Accounts. If you choose a Section 529 College Savings Plan such as this, we will provide you with a prospectus that discusses services, fees, types of investments, among other things. We will also make sure that you have received or have access to, via the Internet, the underlying funds' prospectuses. If you have any questions, we will be happy to answer them. If you choose to proceed with investing in a Section 529 College Savings Plan, we will explain and assist you with the paperwork required to open an account. We will act as a liaison between you and the issuer. Ongoing, we will review your account activity on a regular basis and not less than annually, meet with you to re-assess your financial situation and to help you determine if your investment is appropriately allocated into the correct models. You will sign a limited power of attorney to give Cornerstone Wealth Partners the authority to act on your behalf when re-allocating investment options. However, we do not exercise discretion over these investments other than to facilitate your instructions. Please be advised The Hartford Group does not offer the Section 529 College Savings Plan in the State of Texas.

INVESTOR EDUCATION SERVICES

We provide articles and newsletters (at no cost) on occasion. Content is educational, timely, and helps readers to understand their investment needs.

From time to time, Cornerstone Wealth Partners may hold events designed to provide prospective clients and clients with information about investing. There is no charge or obligation to those attending these events.

COACHING EVENTS

We host coaching events for individuals to uncover important distinctions around money and investing. We will discuss current events, state markets, and how to apply academic principles of investing towards your purpose. There is no charge to participants to attend these events. These events are separate from the services offered and are open to the public (clients and non-clients) to attend.

ADDITIONAL SERVICES

Generally, our advice about securities investments is limited to mutual funds and Section 529 College Savings Plans. While we tailor our investment advice to your individual needs, we do not provide advice on other types of securities, such as stocks or bonds. You may impose reasonable restrictions on investing in certain securities or types of securities with Matson Money's prior approval.

WRAP PROGRAM

We do not sponsor a wrap program. This section is not applicable.

CLIENT ASSETS MANAGED

As of December 31, 2023, we do not manage client assets. We advise on and monitor client assets held with Third-Party Investment Advisers.

ITEM 5 – FEES AND COMPENSATION

FINANCIAL CONSULTATIONS

Our fees for an initial consultation, discussion of your financial needs and goals, and preparation of a market investment analysis of your portfolio range from \$100 to \$10,000, depending on the complexity of your individual situation. We will collect the agreed upon fee upfront upon engagement of the plan.

For ongoing financial consulting where our services include ensuring that information about your specific goals, financial situation and risk preference remain current, assisting you in determining appropriate allocation models, reviewing account activity periodically, meeting with you at least annually, and responding to your inquiries, you will pay an annual flat fee ranging from \$100 to \$10,000 depending on the level and scope of the services required. We will collect the agreed upon fee in quarterly increments, at the beginning of each quarter.

The agreement you and Cornerstone Wealth Partners, LLC sign will detail the scope of the services to be provided and the fee for such services. Fees are charged and collected in advance of services, payable by check or credit card. You will have five (5) business days to terminate the agreement without charge. Should you wish to terminate the agreement after the five-day period, our services will cease. You may terminate at any time without advance notice to Cornerstone Wealth Partners, LLC. Prepaid Financial and Investment Consulting fees are not prorated for refund.

INVESTMENT MANAGEMENT

When you participate in a Matson Money program, ultimately, your investments bear all fund-related fees and expenses, including brokerage fees and operating expenses as well as the expenses derived from the underlying mutual funds in which the Matson Funds invest. As adviser to its funds, Matson Money receives fees of .50% on each fund's average daily net assets as described in the prospectus. As a fund of funds, Matson Funds invest in shares of other registered investment companies. Advisers to the underlying funds are paid an advisory fee by each underlying fund they manage. As a result, you bear their asset-based share of the fees and expenses of each underlying fund as well as of the Matson Fund series in which your assets are invested. No sales loads are paid to Matson Money, Cornerstone Wealth Partners, or any other parties with respect to fund investments. You do not pay Matson Money any separate advisory fee above or beyond the fees embedded in the Matson Funds to participate in a Matson Money program.

Annual fees paid to Cornerstone Wealth Partners are:

<u>Total AUM</u>	<u>Annual Fee</u>
First \$500,000	0.99%
Next \$500,000	0.99%
Next \$3,000,000	0.75%
Over \$4,000,000	0.50%

Fees are negotiable, however the minimum fee permitted by Matson Money is 0.25%.

Please note, total fees charged by both parties will not exceed 3% of assets under management per year. Lower fees for comparable services may be available from other sources.

Annual fees paid to Cornerstone Wealth Partners are collected by Matson Money quarterly in advance, at one-fourth the annual rate. The fees are based on the market value of your account on the last business day of the preceding calendar quarter. You will find the market value of your account on the statement you receive from the custodian carrying your account and on statements provided by Matson Money. The initial fee is due at the time your account is funded and is pro-rated for the number of days remaining in the quarter. The custodian of your assets will deduct the fees from your account and send those fees to Matson Money, who in turn pays Cornerstone Wealth Partners.

Clients who invest in Matson Funds through different co-advisers may pay lower or higher fees to their co-adviser than other investors in the same funds.

Cornerstone Wealth Partners will not, and has no authority to, withdraw fees from your account. With prior notice, Matson Money is willing to permit you to pay the advisory fees directly to Cornerstone Wealth Partners. Matson Money receives no part of the fees paid to Cornerstone Wealth Partners.

You have the right to terminate your agreement with Cornerstone Wealth Partners and Matson Money without penalty within five (5) business days. Otherwise, your agreement may be terminated by any of the parties by giving 30 days prior written notice to the other. Prepaid fees will be refunded on a pro-rata basis.

MONITORING COLLEGE SAVINGS PLANS

If you have engaged Cornerstone Wealth Partners to monitor your Section 529 College Savings Plan, the annual fees are 1.00% of the assets under management with a maximum annual fee of \$499. We invoice your fees in advance at the beginning of the year based on your account value on the last day of the previous calendar year. This invoice is due upon receipt and may be paid by check or credit card. All fees are rounded to the second decimal point.

The initial fee will be pro-rated based on your account value from the first day that your account is funded. Additions to your account at any time other than on the first day of a calendar year may be subject to additional fees on a pro-rata basis based on the number of days from the first day of management to the end of the calendar year. Fees are negotiable and may be waived in Cornerstone Wealth Partners' discretion. You are responsible for all management fees and expenses of your account in addition to fees for the program as described in the issuer's Offering Statement.

These services continue until terminated in writing by you or us. On the effective date of termination any fees due to you will be refunded promptly on a prorated share, based on the remaining days of the year that have been prepaid. We will discontinue all services and responsibilities to you and your account as of the effective date of termination. You will remain responsible for the issuer's charges even though our services have been terminated.

In addition, you have the right to terminate our advisory services without penalty within five (5) business days after entering into the Investment Advisory Agreement. Termination will not affect the validity, liability and obligations of the Investment Advisor Agreement for actions taken before the termination. Your death will not terminate the Investment Advisory Agreement or authority granted to us until we have received actual written notification of your death.

COACHING EVENTS

As discussed in Item 4, we host coaching events for individuals to uncover important distinctions around money and investing. There is no charge to participants to attend these events. These events are separate from the services offered and are open to the public (clients and non-clients) to attend.

GENERAL INFORMATION

The fees charged are calculated as described above and are not charged based on a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory client.

All advisory fees are separate from charges assessed by third parties, such as broker/dealers, custodians, mutual fund companies, etc. Each rebalancing or reallocation of your portfolio may involve transaction charges imposed by the custodian. Brokerage and other transaction costs charged by broker/dealers executing the transactions and custodians maintaining your assets are in addition to the management fees and are non-negotiable. Mutual funds, variable annuities or other platforms charge may assess other fees and expenses, such as 12B-1 fees and/or commissions in connection with the placement of your funds into certain investments. Cornerstone Wealth Partners does not receive any of these commissions, charges, and/or fees.

Depending on individual arrangements made, fees paid by one client may be higher or lower than fees paid by another client under similar circumstances. Advice provided by Cornerstone Wealth Partners may differ from one client to another.

OTHER SECURITIES COMPENSATION

We do not receive any additional securities compensation. The item is not applicable.

As established in Item 10 – Other Industry Affiliations, earning commissions for the sale of insurance products creates a conflict of interest. Please see Item 10 for additional details and conflicts of interest associated with the sale of insurance products.

ITEM 6—PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT

We do not accept performance-based fees, that is, fees based on a share of capital gains or appreciation of the assets of a client. We do not participate in side-by-side management. Side-

by-side management refers to the practice of charging performance-based fees for account management while at the same time managing accounts that are not charged performance-based fees.

ITEM 7—TYPES OF CLIENTS

We provide our advisory services to individual investors, pension and profit-sharing plans, trusts, estates, charitable organizations, and businesses. There is no minimum net worth or minimum portfolio requirement for our financial planning services. While we do not have any requirements for opening or maintaining an account, Matson Money requires \$10,000 in assets for its Matson Funds and Frontier Adjusted Portfolio Programs. The issuers of Section 529 College Savings Plans may have investment minimums and other limits. For example, The Hartford Group's investment minimums and limits are \$250 per investment option, \$25 minimum for subsequent investments, and \$265,520 maximum contribution limit for each designated beneficiary.

ITEM 8—METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

We understand that Matson Money utilizes Modern Portfolio Theory and the Efficient Market Philosophy to create and manage portfolios that fall on the efficient frontier. These portfolios are reviewed typically on a quarterly basis and rebalanced as needed. Matson Money does not make asset allocation decisions based on the conditions of the economy or the market, but rather on economic research related to the manner in which various asset classes have performed and the correlation of their performance over time. Cornerstone Wealth Partners supports Matson Money's methods as well as those instances where Matson Money may utilize variable rate annuities in its portfolios as well as life insurance contracts.

Investment strategies are dictated by Matson Money and Section 529 College Savings Plans within their asset allocation models and underlying mutual funds. Matson Money may use fixed or variable rate annuities in its portfolios as well as life insurance contracts. Asset allocation with quarterly rebalancing is typical (except in Section 529 College Savings Plan) but may be more or less frequent depending upon the particular portfolio manager's strategies.

INVESTMENT RISKS

Investing in securities involves risk of loss that you should be prepared to bear. Investment values will fluctuate, are subject to market volatility, and may be worth more or less than original cost. Typically, Matson Money requests clients to sell securities in order to make funds available to purchase the mutual funds or other commingled investment vehicles Matson Money recommends. In those situations where there would be adverse tax consequences to a client, Matson Money may recommend the client hold the security or sell it over time in a tax efficient manner.

When investing in a Section 529 College Savings Plan, you should consider that the Plans have special benefits in the form of special state tax incentives for taxpayers of a certain state. If you reside in or have taxable income in a different state, consider whether your state has a qualified tuition program that offers favorable state income tax or other benefits exclusive to your state's program that may not be available under other Section 529 College Savings Plans. You should

consult with a qualified tax advisor to explore tax consequences. Investments in Section 529 College Savings Plans are not guaranteed or insured and are subject to investment risks, including the loss of the principal amount invested, and may not be appropriate for all investors.

RECOMMENDED SECURITIES

We may use several types of securities in client portfolios including, but not limited to: stocks; bonds, corporate, federal, state, municipal, and agency debt; money market funds; mutual funds (open and closed-end investment companies); exchange traded funds; unit investment trusts; and traded real estate investment trusts. Some of the risk associated with these securities include:

- **Credit risk:** This is the risk that an issuer of a bond could suffer an adverse change in financial condition that results in a payment default, security downgrade, or inability to meet a financial obligation.
- **Inflation Risk:** This is the risk that inflation will undermine the performance of an investment and/or the future purchasing power of a client's assets.
- **Interest rate risk:** The chance that bond prices overall will decline because of rising interest rates.
- **International investing risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, as well as regulatory and financial reporting standards, that differ from those of the U.S.
- **Manager risk:** The chance that the proportions allocated to the various securities will cause the client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.
- **Stock market risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.

ITEM 9—DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. These include the following:

- A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the *firm* or *supervised person*
 - 1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any *felony*; (b) a *misdemeanor* that *involved* investments or an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury,

forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;

2. is the named subject of a pending criminal *proceeding* that involves an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation; or
4. was the subject of any *order*, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the *supervised person* from engaging in any *investment-related* activity, or from violating any *investment-related* statute, rule, or *order*.

We have no information applicable to this item.

B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which the *firm* or *supervised person*

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
2. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority
 - i. denying, suspending, or revoking the authorization of the *supervised person* to act in an *investment-related* business;
 - ii. barring or suspending the *supervised person's* association with an *investment-related* business;
 - iii. otherwise significantly limiting the *supervised person's investment-related* activities; or
 - iv. imposing a civil money penalty of more than \$2,500 on the *supervised person*.

On January 31, 2024, Cornerstone Wealth Partners, LLC and Evan Vanderwey, 100% owner and Chief Compliance Officer of Cornerstone Wealth Partners, LLC, paid all fines/penalties and signed a consent order with the California Department of Financial Protection and Innovation.

The consent order concluded that Cornerstone Wealth Partners, LLC and Evan Vanderwey violated Section 25230 of the Corporations Code by engaging in the investment advisory business without being licensed or exempt under the CSL between 2020 and 2023. Based on the consent order Cornerstone and Vanderwey must desist and refrain from further violations of section 25230 of the Corporations Code by engaging in the investment advisory business without being licensed or exempt. Cornerstone and Vanderwey consented to paying the past due licensing fee of \$375 and \$15,000 in penalties.

Details of the consent order can be found here: <https://dfpi.ca.gov/enf-c/cornerstone-wealth->

[partners-llc/](#).

C. A *self-regulatory organization (SRO) proceeding* in which the *firm* or *supervised person*

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
2. was *found* to have been *involved* in a violation of the *SRO's* rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from *investment-related* activities; or (iii) fined more than \$2,500.

We have no information applicable to this item.

D. Any other *proceeding* in which a professional attainment, designation, or license of the *supervised person* was revoked or suspended because of a violation of rules relating to professional conduct. If the *supervised person* resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a *proceeding* (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.

We have no information applicable to this item.

ITEM 10—OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

BROKER DEALER AFFILIATION

We are not affiliated with a broker-dealer.

FUTURES/COMMODITIES FIRM AFFILIATION

We are not affiliated with a futures or commodities broker.

OTHER INDUSTRY AFFILIATIONS

We are required to disclose material relationships that we may have with related financial industry participants. Cornerstone Wealth Partners, LLC is not affiliated with any other financial institution. Its owner, Evan Vanderwey, and other employees are loan officers and/or branch managers for Churchill Mortgage. If they arrange a mortgage for you, Churchill Mortgage receives a percentage of mortgage-related charges paid by you. Therefore, a conflict of interest will exist if we recommend that you obtain a mortgage through Churchill Mortgage. Since we have no way to overcome this conflict, you should consider that you are under no obligation to obtain a mortgage through anyone we recommend.

Two employees of Cornerstone, in their individual capacities, are also licensed insurance agents, and in such capacity, may recommend, on a fully disclosed commission basis, the purchase of certain insurance products. While Cornerstone does not sell such insurance products to its clients, Cornerstone does permit its employees to sell insurance products to their clients. This creates a conflict of interest because Cornerstone's adviser recommends the purchase of insurance products where Cornerstone's employees receive insurance commissions and/or other additional compensation.

RECOMMENDATION OF THIRD PARTY INVESTMENT ADVISER

At this time, Cornerstone Wealth Partners usually recommends only one portfolio manager, Matson Money. However, we may change this if we believe there is a more appropriate choice in the future. Other portfolio managers may use similar strategies as Matson Money, may cost more or less than Matson Money, may minimize overall portfolio turnover, or may have investment philosophies similar to our own. We are required to put your interests before our own. Since as an investment adviser, we put your interests before our own, we have implemented these procedures to make sure that you benefit from using the recommended portfolio managers: (1) We gather detailed information from you to determine if you will benefit more from using a recommended manager. (2) Ongoing, we review the manager's performance and handling of your portfolios. (3) We review other portfolio managers' programs to become familiar with alternatives that may be appropriate for you. We will also ensure that Matson Money is properly registered or exempt from registration in your state of residence prior to making any recommendations.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTION AND PERSONAL TRADING

DESCRIPTION

Cornerstone Wealth Partners has adopted a formal Code of Ethics. This Code of Ethics includes requirements to make sure that we meet our fiduciary responsibilities:

1. We will put your interests before our own interests.
2. You have the right to specify your investment objectives, guidelines, and/or conditions on the overall management of your account.
3. We will not make investment decisions for our personal portfolios if the decision is based on information that is not also available to the investing public.
4. We will not participate in private placements or initial public offerings (IPO's) that may affect your investments without disclosure to you.
5. We always make every effort to comply with all applicable federal and state regulations governing registered investment advisers.

The full text of our Code of Ethics is available to you upon request.

MATERIAL INTEREST IN SECURITIES

We nor our related persons have a material interest in any securities.

INVESTING IN OR RECOMMENDING THE SAME SECURITIES

We may invest in or recommends the same securities as our clients. This practice would create a conflict of interest if the transactions were structured to trade on the market impact caused by recommendations made to our clients. Our clients' transactions and our own transactions usually trade in sufficiently broad markets where these transactions will not have an appreciable impact on the securities' market value. Evan Vanderwey reviews our personal transactions quarterly to make sure that our personal transactions are consistent with advice given to clients.

ITEM 12 – BROKERAGE PRACTICES

RECOMMENDATION CRITERIA

We do not recommend broker-dealers or custodians. All brokerage and custodian recommendations are handled by Matson Money. Please refer to the recommended Third-Party Adviser's ADV Part 2A, Item 12 for additional information regarding the use of qualified custodians.

RESEARCH AND SOFT DOLLARS

"Soft dollars" are defined as a form of payment investment firms can use to pay for goods and services such as news subscriptions or research. When an investment firm gives its business to a particular brokerage firm, the brokerage firm in return can agree to use some of its revenue to pay for these types of services.

BROKERAGE FOR CLIENT REFERRALS

We do not receive client referrals or any other incentive from any broker-dealer or custodian.

DIRECTED BROKERAGE

Some clients may direct us to a specific broker-dealer to execute securities transactions for their accounts. When so directed, we may not be able to effectively negotiate lower brokerage commissions or achieve best execution on those clients' transactions. This can result in substantially higher fees, charges or dealer concessions in one or more transactions for the clients' accounts because we cannot negotiate favorable prices.

TRADE AGGREGATION

We do not aggregate trades for client account. This item is not applicable.

ITEM 13 – REVIEW OF ACCOUNTS

PERIODIC REVIEWS

Our Investment Adviser Representatives continuously monitor their client accounts and conduct annual reviews or as often as requested by the client to provide any updates as necessary. Third party portfolio managers, such as Matson Money, also monitor accounts daily for trading and rebalancing purposes.

Evan Vanderwey will review all transactions and instructions before they are transmitted to Hartford for 529 College Savings plans.

OTHER REVIEWS

Additional reviews are conducted periodically depending on market conditions, economic or political events, or by changes in a client's financial situation (such as retirement, termination of employment, physical move or inheritance).

REPORTS

The mutual fund managers and/or the brokerage firm handling your account send you account statements at least quarterly, but usually monthly. These account statements show money balances, investment values, and transactions. Account activity, positions, and account balances

are available for view 24 hours a day on Matson Money's and Hartford's web sites.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

Clients participating in one of the programs offered by Matson Money, Cornerstone Wealth Partners is paid advisory fees, which are more fully described above under "Fees and Compensation". Matson Money also provides marketing assistance to Cornerstone Wealth Partners. While Matson Money generally charges for marketing assistance, some marketing assistance may be provided without charge as the amount of assets referred to Matson Money increases. Matson Money may provide its investment advisory services to persons working for Cornerstone Wealth Partners at low or no cost and at reduced costs to their family members. While this factor does not change the amount of fees paid by you, these benefits could represent incentives for us to recommend Matson Money over other third party managers. See "Other Financial Industry Activities and Affiliations" above for a description of our procedures addressing potential conflicts when recommending Matson Money.

Client Appreciation – We may invite clients to bring guests to a periodic customer appreciation dinner. If the guest becomes our client, it could be construed that the client bringing the guest was compensated by a meal.

ITEM 15 – CUSTODY

All client funds, securities, and accounts are held with Third-Party Custodians. We do not take custody of your funds and securities. Because of this, we do not accept securities or forward securities to your brokerage firm or custodian. The only checks payable to Cornerstone Wealth Partners, LLC that we accept are those payable for our Monitoring of College Saving Plans. We will not have authority to withdraw securities or funds from your account, you will authorize Matson Money to withdraw the advisory fees from your account. You may cancel this authorization at any time.

Periodically, you will receive account statements from your brokerage firm or custodian. You will also receive account statements or other reports from Matson Money or Hartford, as applicable. We urge you to compare account statements you receive from your brokerage firm or custodian with statements, reports and invoices that you receive from Matson Money or Hartford. Please let us know if there are any discrepancies.

ITEM 16 – INVESTMENT DISCRETION

When you engage our services to monitor your Hartford Smart529 College Savings Plan, you will sign a limited power of attorney to give Cornerstone Wealth Partners authority to enter transactions on your behalf and to transmit your instructions to Hartford. When we accept this authority, our internal controls require that Evan Vanderwey personally reviews the transactions or instructions before transmitting them to Hartford.

When you participate in a Matson Money program, Matson Money generally exercises discretionary authority to manage investments on your behalf. Typically, you grant Matson Money a limited power of attorney for investment purposes. These powers do not provide Matson Money with a general power of attorney to access your custodial accounts. In addition, Matson Money Investment Management Agreements do not provide Cornerstone Wealth

Partners, LLC with any authority to access, or to make or direct transactions in, your accounts. Matson Money may, at its sole discretion, terminate its management if you provide us with more expansive authority, such as trustee powers, over the Matson Money-managed account(s).

ITEM 17 – VOTING CLIENT SECURITIES

We do not vote client proxies. Your brokerage firm, custodian, or transfer agent may send proxies or other solicitations about your securities directly to you. We do not provide advice on how to handle proxy solicitations. However, for assets managed by Matson Money, you and Matson Money will decide on voting privileges at the time you agree to engage the investment manager. For your assets held in a Matson-managed fund of funds, you will authorize Matson Money to vote proxies on the underlying mutual funds held by the Matson Fund held in your account, including proposals relating to increases in a mutual fund's advisory, distribution and/or service (12b-1) or other fees. For the Matson- managed fund of funds, itself, you are responsible for voting all proxies. If you are subject to ERISA, Matson Money will vote on all proxies for, and take action concerning legal proceedings regarding, Matson-managed mutual fund shares held in your account unless the right to vote such proxies and take such action has been expressly reserved to another person. In such a circumstance, you will indicate to Matson Money who will vote proxies. Any questions about our proxy policy can be directed to Joshua VanDyke at 616-550-9461.

ITEM 18 – FINANCIAL INFORMATION

BALANCE SHEET

We do not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance. Therefore, we are not required to provide a balance sheet.

FINANCIAL CONDITION

We are required in this Item to provide you with certain financial information or disclosures about our financial condition if we have a financial commitment that impairs our ability to service you. We do not have a financial commitment that impairs our ability to service our clients. We do not have discretionary authority or custody of client funds or securities.

BANKRUPTCY

We have not been the subject of a bankruptcy proceeding.

ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

We have one principal executive officer, Evan G Vanderwey. Evan Vanderwey's biographical information is provided in the attached Brochure Supplement document.

Evan Vanderwey is required to disclose additional information if he has other business activities. Evan Vanderwey is a loan officer and Michigan Branch Manager for Churchill. Additional information about this non-investment related business activities can be found in his brochure supplement – ADV Part 2B.

Evan Vanderwey is also required to disclose additional information if he receives performance-based fees, have any relationship or arrangement with an issuer of securities, or were ever found liable in an arbitration, civil, self-regulatory organization or administrative proceeding. He has no information to report on these topics.

CONFLICTS OF INTEREST DISCLOSURE

In this Part 2, the firm, its representatives and employees have disclosed all material conflicts of interests that could reasonably be expected to impair the rendering of unbiased and objective advice. The conflicts of interest may include but are not limited to: (a) compensation arrangements connected with advisory services which are in addition to the advisory fees, (b) other financial industry activities or affiliations, or (c) participation of interest in client transactions.

BUSINESS CONTINUITY PLAN

We have Disaster Recovery and Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, and/or services.

The plan covers natural disasters such as snowstorms, hurricanes, tornados, and flooding. The plan also covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, telephone communications line outage, internet outage, railway accident and aircraft accident. Electronic files are backed up daily and stored on encrypted cloud services providers.

Alternate offices are identified to support ongoing operations in the event of the main office is unavailable. The client's custodian may also assist, depending on the type of disaster, with back office and trading assistance for accounts held in custody by them. The client's custodian has its own disaster recovery plans with backup facilities in different parts of the U.S. It is the firm's intention to contact all clients within 5 days of a disaster that dictates moving its office to an alternate location for a period of time.